ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
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JB PRITZKER, GOVERNOR **JOHN J. KIM**, DIRECTOR

(217) 785-6309

December 20, 2019

Ms. Sarah Rolfes
United States Environmental Protection Agency
Superfund Division, Mail Code SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Remedial Investigation Report, Rev.1 and Rev 2.
The Peoples Gas Light and Coke Company
Division Street Station
Willow Street Station
North Station
Former Manufactured Gas Plants
Chicago, Illinois

0316005885 – Cook County
Chicago/Peoples Gas – Division Street Station
Superfund/Technical File

0316075229 – Cook County
Chicago/Peoples Gas – Willow Street Station
Superfund/Technical File

0316085749 – Cook County
Chicago/Peoples Gas – North Station
Superfund/Technical File

Dear Ms. Rolfes:

The Illinois Environmental Protection Agency (Illinois EPA or State) has reviewed the Response to Comment on *Remedial Investigation Report, Revision 2, The Peoples Gas Light and Coke Company, North Branch of the Chicago River Willow Street Station, Division Street Station, and North Station Operable Unit 2, North Branch Site, Chicago, Illinois*. The comment was submitted by the United States Environmental Protection Agency (U.S. EPA) on November 25, and the Peoples Gas Light and Coke Company (PGL's) response is dated December 6, 2019.

Illinois EPA provides the following response:

Illinois EPA Comment Omitted from U.S. EPA response to PGL:

Comment #1 – Revision 1: "Construction workers are generally not assumed to move randomly throughout a larger exposure area. Rather, their work is often restricted to a smaller area such as a trench or foundation. As a result, it is not appropriate to calculate an exposure point concentration (EPC) for construction workers as a 95 percent upper confidence limit on the mean (95 UCL). Therefore, Revision 1 should be revised to use only maximum detected concentrations as the soil EPC for construction worker exposure scenarios. This will impact the evaluation of lead in sediment because the maximum detected concentration of lead exceeds the screening level of 700 milligrams per kilogram (mg/kg)."

"For lead detections, the State is willing to re-evaluate the data during review of the Feasibility Study (FS) when the extent of any anticipated removal and/or remediation is presented. As part of the FS, additional maps may be requested by Illinois EPA to show individual lead exceedances at or above 700 mg/kg, particularly for samples not co-located with TPAH and BTEX exceedances that would potentially be targeted for removal and/or remediation."

US EPA Response (via email)

General Comment 1 – Rev. 1: EPA Risk Assessment Guidance specifies the use of 95 percent upper confidence limit on the mean (95 UCL), as opposed to the maximum detected concentrations for construction worker exposure scenarios (see Section 6.4.1 of EPA's Risk Assessment Guidance, page 6-19, for further discussion concerning the use of maximum detected concentrations vs. 95 percent upper confidence limit). As the RI includes the Baseline Risk Assessment which follows EPA guidance, the method utilized is appropriate and reasonable for the RI.

Illinois EPA Follow-up Response

Illinois EPA reviewed Section 6.4.1 of Risk Assessment Guidance for Superfund and acknowledges the guidance's support of the 95% UCL on the mean as the preferred exposure point concentration. However, Section 6.4.1 also indicates that there may be exceptions to such a generalization and points to Section 6.5.3 for further consideration. Section 6.5.3 discusses the fact that contamination may be distributed unevenly across sites resulting in hot spots, and it is the "uneven" exposure experienced by construction workers coupled with potential hot spots that Illinois EPA is concerned about for the construction worker. Illinois EPA acknowledges that USEPA will not adopt the maximum site concentration as the appropriate exposure concentration for the construction worker, but neither will Illinois EPA simply abandon its protocols for evaluating risks to this receptor. Illinois EPA again suggests, as a work around that will satisfy both Agencies' needs, for information to be presented in such a way that Illinois EPA can further

evaluate any potential risks to construction workers from potential hot spots in areas not already being addressed. Illinois EPA can then make its own risk management decision regarding whether or not this receptor class should be afforded any additional protection due to any clustering of higher concentrations, for instance.

USEPA Comment 1 to PRP – Revision 2: To fully inform the Feasibility Study process, the Baseline Risk Assessment should be revised to evaluate and include all human health COCs for the entire range of EPA's generally acceptable risk range of 10-6 to 10-4. As presently discussed in the Baseline Risk Assessment, human health risks are presented as within the acceptable range, if the calculated risk falls within the range of 10-6 to 10-4. Please review the risk assessment and revise it to include risks for the entire range. Please also revise Section 6, as necessary. As part of the Feasibility Study, a risk management decision will be made concerning the target risk level.

PRP Response to Comment: PGL understands that as part of the Feasibility Study (FS), USEPA will make a risk management decision concerning the appropriate target cancer risk level to be applied at each site. In preparation for the FS, the RI Reports Baseline Risk Assessment (BLRA) (Revision 2) was written to describe chemical risks in comparison to the risk management criteria developed by USEPA and not to any preconceived acceptable target risk criteria or range.

To address USEPA's comment on the BLRA (Revision 2), to provide an expanded presentation of risk and fully inform a risk management decision, PGL will provide a BLRA summary in the FS that includes a table of chemicals of potential concern (COPC) and their respective calculated risk values that are above each target cancer risk criteria (10-6, 10-5, 10-4) and the noncancer hazard index (HI) of one. Please note, while the BLRA (Revision 2) does not currently provide this expanded table, all the information required to prepare it are in Table 1A of the BLRA (Revision 2) and the supporting tables of risk, presented by exposure scenario, on the BLRA Back-up CD.

Illinois EPA Response to Response to Comment: The State thanks U.S. EPA for forwarding its concerns and is satisfied with this response.

If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 785-6309 or via email at **Christopher.M.Peters@illinois.gov**.

Sincerely,

Chris M. Peters
Remedial Project Manager
Federal Site Remediation Section
Bureau of Land

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